

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION**

CINCINNATI BENGALS, INC.,

Case No. 1:09 CV 738

Plaintiff,

Hon. Sandra S. Beckwith

- against -

Hon. Timothy S. Black

KHALID ABDULLAH, SAM ADAMS,
MARCO BATTAGLIA, RASHAD
BAUMAN, ROGERS BECKETT, VAUGHN
BOOKER, DUANE CLEMONS, RON
DUGANS, DAVID DUNN, CHRIS
EDMONDS, OLIVER GIBSON, DAMON
GRIFFIN, KEVIN HARDY, RODNEY
HEATH, NICK LUCHEY, TREMAIN
MACK, TIMOTHY MCGEE, TONY
MCGEE, REGGIE MYLES, HANNIBAL
NAVIES, SCOTT REHBERG, ADRIAN
ROSS, TROY SADOWSKI, DARNAY
SCOTT, KABISA AKILI SMITH,
ARMEGIS SPEARMAN, GLEN STEELE,
DENNIS WEATHERSBY, RICHMOND
WEBB, BERNARD WHITTINGTON AND
DARRYL WILLIAMS, and REINARD
WILSON

Defendants.

**DECLARATION OF REINARD WILSON IN SUPPORT OF
HIS MOTION TO VACATE A DEFAULT JUDGMENT, INJUNCTION AND
ORDER OF CONTEMPT**

REINARD WILSON, hereby declares as follows:

1. I am a former professional player in the National Football League. Between 1997 and 2002, I played for the Cincinnati Bengals. I make this declaration, of my own personal knowledge, in support of my motion to vacate the default judgment against me.
2. On or about June 12, 2006, I filed an action against the Bengals in the Workers'

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Compensation Appeals Board of the State of California ("WCAB"). I sought to obtain disability payments for injuries sustained in California during my employment with the Bengals.

3. On April 21, 2008, the WCAB found in my favor against the Bengals. The WCAB held that I suffered from 84% overall permanent disability, which equates to 552.50 weeks of disability payable at \$230.00 per week and totals \$127,075.00. The WCAB also held that, once these disability payments are exhausted, I am entitled to a life pension of \$92.77 per week. The WCAB denied the Bengals' motion for reconsideration of the award on June 24, 2008. Attached hereto as Exhibit A is a true and correct copy of the Award.

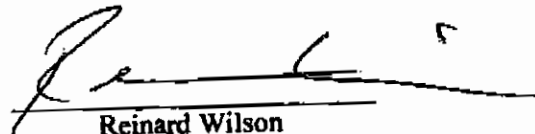
4. With respect to this action, I do not recall receiving any legal papers. If I did receive any legal papers from the Bengals, I assumed that they related to the California action and that copies were sent to my attorney.

5. I understand, however, that a copy of the summons and complaint from this action were attempted to be served on me by certified mail, but that those papers were returned unclaimed.

6. I did not become aware of this action until September 2009.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on November 4, 2009 in White Springs, FL.


Reinard Wilson